

Exhibit D**State of Wisconsin****Circuit Court****Monroe County**

STATE OF WISCONSIN	Plaintiff,	Agency: Monroe County Sheriff DA Case No.: 2011MO002524 Assigned DA/ADA: Daniel D. Cary Agency Case No.: 11-2171 Court Case No.: 2011CF000007 ATN:
Michael B. Kingsley 124 East Veterans Street #2 Tomah, WI 54660 DOB: [REDACTED] Sex/Race: M/W Eye Color: Blue Hair Color: Brown Height: 5 ft 7 in Weight: 200 lbs Alias: Also Known As Mike B. Kingsley Also Known As Mike Kinglsey Also Known As Michael Kingsley Also Known As Michael Brandon Kingsley		FILED JAN 04 2012 Clerk of Circuit Court Monroe County, Wisconsin

Criminal Complaint

Defendant,

Sheriff Peter H. Quirin of the Monroe County Sheriff's Department being first duly sworn, states that:

Count 1: UTTERING A FORGERY, REPEATER

The above-named defendant on or about Thursday, December 01, 2011, Monroe County, Wisconsin, did possess with intent to utter or utter as genuine, any forged writing or writing of a kind whereby legal rights and obligations are created, knowing the writing to have been falsely made, to wit: victim ~ Sheena R. Kingsley, contrary to sec. 943.38(2), 939.62(1)(b) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 4 years if the prior conviction was for a felony.

Count 2: THEFT - MOVEABLE PROPERTY (> \$2500 - \$5000), REPEATER

The above-named defendant on or about Thursday, December 01, 2011, Monroe County, Wisconsin, did intentionally take and carry away, use, transfer, conceal or retain possession of movable property of Sheena R Kingsley, having a value greater than \$2500 but less than \$5000, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(bf), 939.62(1)(b) Wis.

Date 2-17-12



Shirley R. Chaperon
Clerk of Circuit/Authorized Deputy Clerk

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Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 4 years if the prior conviction was for a felony.

PROBABLE CAUSE:

Complainant relates that he has reviewed incident reports prepared by Det. Sgt. Ron Rader of the Monroe County Sheriff's Department, a law enforcement officer believed to be truthful and reliable which indicates that on December 1, 2011 at approximately 10:15 a.m., Sgt. Rader was assigned to look into a complaint regarding possible theft of money that had been posted for the bond of inmate Michael Kingsley. Sgt. Rader was advised by Lt. Stan Hendrickson of the Monroe County Jail that the jail previously had an inmate by the name of Michael Kingsley. Lt. Hendrickson further indicated that Kingsley's sister-in-law, Sheena Kingsley, had posted a \$5,000 bond for Michael Kingsley earlier in the year and that at the time of this complaint Kingsley had already been transferred to a prison facility. Sgt. Rader was advised that Kingsley had prepared a letter in which he indicated that the bond that Sheena Kingsley had posted for him was to be released to him. Lt. Hendrickson further stated that Sgt. Patricia Fish of the Monroe County Jail, apparently notarized the form for Michael Kingsley during July 2011. On information and belief, this document was presented to the Circuit Court by the defendant at his sentencing hearing on October 14, 2011. Based on the letter that Michael Kingsley filed with the Court on August 3, 2011 before the Honorable J. David Rice, the Court authorized refund of the bond to the defendant Michael Kingsley.

Det. Sgt. Rader had contact with Sheena Kingsley on December 19, 2011. This contact occurred by telephone between Sgt. Rader and Sheena Kingsley. Ms. Kingsley was at the Dane County Sheriff's Department in the presence of Deputy John Nelson of the Dane County Sheriff's Department during the interview. On information and belief Deputy Nelson identified Sheena Kingsley, collected a written statement from Sheena Kingsley regarding this incident. During this conversation, Sheena Kingsley told Det. Sgt. Rader that sometime in July of 2011 Michael Kingsley had called her and had said something to her about the bond. Sheena Kingsley stated she did not remember what Michael Kingsley said and that she didn't listen to what he had to say and that she was not interested in what Michael had to say. Sheena Kingsley stated that she knows that she never authorized Michael Kingsley to keep or use any bond money that she had previously posted for him and further that she never authorized Michael Kingsley to sign her name. Sheena Kingsley stated that her husband did not authorize Michael Kingsley to take the bond money either. Sheena Kingsley insisted that no one authorized Michael Kingsley to take the bond money that she had posted nor had anyone authorized Michael Kingsley to sign her name to anything.

FILED
JAN 14 2012
Clerk of Circuit Court
Monroe County, Wisconsin

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In a report prepared by Sgt. Pat Fish of the Monroe County Sheriff's Department, Fish indicates that on July 17, 2011 she was working at the Monroe County Jail and during her shift, inmate Michael Kingsley asked Fish if she could notarize something for him. Sgt. Fish stated that she told Kingsley that she would when time permitted and at some point later did go back to Kingsley's cell to notarize his paperwork. Sgt. Fish stated that Kingsley handed her the paperwork and that Fish knew that this paperwork would be going to the Clerk of Court and it was in reference to a change of address and a bond. Sgt. Fish indicated that at that time she notarized the paperwork and that she does not recall if Sheena Kingsley's signature was on the paperwork at the time she notarized it. Sgt. Fish stated that she did not witness the signature of Sheena Kingsley on the document but that she witness and notarize Michael Kingsley's signature on July 17, 2011 on the same document.

In a second report by Sgt. Fish, Fish stated that on October 19, 2011 a check for \$4,632 was deposited in the account of Michael Kingsley and that this check was from the Monroe County Clerk of Courts and its number was 019728. Sgt. Fish stated that on October 25, 2011, Michael Kingsley was transported from Monroe County Jail to the Dodge Correctional Institution to serve a prison sentence and that Kingsley's jail account was closed on October 25, 2011. Sgt. Fish further indicated that a check was then printed and signed and was sent to Dodge Correctional in the amount of \$2,109.39.

Your complainant further advises he has been informed of Monroe County Case No. 2008CF000153, State of Wisconsin v. Michael B. Kingsley, in which the defendant Michael Kingsley, was convicted on or about October 3, 2008 of Felony Conspiracy to Manufacture/Deliver Cocaine as a Second or Subsequent Offense, contrary to and in violation of Wis. Stats. § 961.41(1)(cm)1g. Said conviction or convictions remain of record and unreversed, thereby making the defendant a habitual criminal pursuant to Wisconsin law.

On information and belief the above incident occurred in Monroe County, Wisconsin.

Based on the foregoing, the complainant believes this complaint to be true and correct.

Subscribed and sworn to before me,
and approved for filing on:

Dated: 1/4/12


Peter H. Quirin
Complainant

Know ledge (for:)
Daniel D. Cary
District Attorney
State Bar No. 1022271
DDC/cml

FILED
JAN 26 2012
Clerk of Circuit Court
Monroe County, Wisconsin